

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,
as representative of
THE COMMONWEALTH OF PUERTO
RICO, *et al.*,
Debtors.

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**REQUEST FOR LEAVE TO FILE EXHIBITS TO RAMHIL DEVELOPERS INC.'s
OBJECTION TO DOCKET NO. 19353 WITHOUT CERTIFIED TRANSLATIONS AND
AN EXTENSION OF TIME TO FILE THE SAME**

To the Honorable United States District Court Judge Laura Taylor Swain:

COMES NOW Ramhil Developers, Inc., represented by the undersigned attorneys, and very respectfully avers and prays as follows:

1. On November 23, 2021, the Financial Oversight and Management Board (the "FOMB"), as sole Title III representative of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority (collectively, the "Debtors") filed a motion titled "Notice of Executory Contracts and Unexpired Leases to be Assume Pursuant to Title III Plan of Adjustment" (Dkt. #19353) (the "Motion to Assume"). According to the Motion to Assume, objections were set for December 13, 2021, at 5:00 p.m.

2. In the Motion to Assume, Debtors listed in page 25 of Exhibit A (the "Schedule"), Contract No. 2011-00244 with lessor Ramhil Developers, Inc., as one of the contracts to be assumed. (Dkt. #19353).

3. The Motion to Assume was sent to a wrong address that does not belong to Ramhil. Through the undersigned attorney, Ramhil informed the Debtors that the Motion to Assume was sent to a wrong address and that at the time of its receipt the period to file objections had expired. Debtors evaluated the documents and explanation proffered by Ramhil representatives and agreed to Ramhil filing a response to the Motion to Assume on or before **January 18, 2022.**

4. Today, Ramhil is filing an objection to Debtor's motion titled "Notice of Executory Contracts and Unexpired Leases to be Assume Pursuant to Title III Plan of Adjustment" (Dkt. #19807).

5. In the Motion there are 12 Exhibits that are being filed in the Spanish Language. Because of time constraints, the lessor has not been able to procure certified translations of all the Spanish language documents and foresees that this could be a contested matter.

6. Ramhil hereby request leave to file the aforementioned documents in their original Spanish language and to subsequently submit certified translations within the next thirty (30) days in order to comply with the legal requirements.

WHEREFORE, Debtors respectfully request this Honorable Court that it be granted leave to file the exhibits to its "Objection to Assume Executory Contract" in their original Spanish language, and an extension of thirty (30) days to submit certified translations to said documents.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of January 2022.

CERTIFICATE OF SERVICE

Certificate of Service: I hereby certify that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM-ECF system which will send notification of such filing to the CM/ECF participants and parties in interest as per master address list.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 18th day of January 2022.

/s/Edgardo L. Rodríguez-Cardé

Edgardo L. Rodríguez-Cardé
USDC-PR No. 218110
P.O. Box 365061
San Juan, P.R. 00936-5061
Tel.: 787-772-9911
Fax: 787-281-7816
e-mail: elrc@rclopr.com

/s/María S. Lozada-Figueroa

María S. Lozada-Figueroa
USDC-PR No. 222811
P.O. Box 9023888
San Juan, P.R. 00902-3888
Tel.: 787-533-1400
e-mail: msl@lozadalaw.com

Attorneys for Ramhil Developers, Inc.